

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**NOTICE OF CORRESPONDENCE REGARDING THE ONE HUNDRED
NINETEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE
COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO
INDIVIDUAL PROOF OF CLAIM NO. 7611.**

To the Honorable United States District Judge Laura Taylor Swain:

1. On December 12, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Board”), as the sole Title III representative of the Commonwealth, HTA and ERS (collectively, the “Debtors”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² filed the *One Hundred Nineteenth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9569] (the “One Hundred Nineteenth Omnibus Objection”) to various proofs of claim.

2. The One Hundred Nineteenth Omnibus Objection seeks to disallow certain deficient claims which purport to assert liabilities against the Commonwealth, HTA, or ERS, but fail to provide critical information needed to understand what liabilities any of the Commonwealth, HTA, ERS, or any other Title III Debtor may owe.

3. The Debtors have received the attached correspondence from Luz S. Carmona Torres (“Carmona Torres”), a copy of which is attached hereto as Exhibit “A”, (the “Carmona Torres Response”), regarding Proof of Claim No. 7611 (the “Carmona Torres Claim”). A certified translation of the Carmona Torres Response is attached hereto as Exhibit “A-1”.

4. The Carmona Torres Response consists of a handwritten note explaining that Carmona Torres “does not wish to continue with this process nor any type of claim against” the Oversight Board. Accordingly, the Debtors have determined the Carmona Torres Response does not provide sufficient information to enable the Debtors to reconcile the Carmona Torres Claim.

5. Accordingly, the Debtors respectfully request that the Court grant the One Hundred Nineteenth Omnibus Objection and disallow the Claim, notwithstanding the Carmona Torres Response.

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Dated: November 13, 2020
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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